

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

**VIA ECF**

November 22, 2023

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs Executive Committees ("PECs") and counsel for the *Ashton* Plaintiffs write, on behalf of all Plaintiffs, to respectfully request a brief extension of time, from December 8, 2023 to December 20, 2023 to file consolidated oppositions to the renewed motion to dismiss of Saudi Arabia and the motion to dismiss of Dallah Avco. Saudi Arabia opposes this extension request and intends to file a brief response. Dallah Avco "defers to Saudi Arabia's position and, in any event, requests that the Court keep Dallah Avco on the same schedule as Saudi Arabia."

By way of background, the Court's Order at ECF No. 9026 authorized the PECs and *Ashton* Plaintiffs to file separate briefs and supporting papers in opposition to Saudi Arabia's motion to dismiss. Based on coordination discussions that have been and remain ongoing, the PECs and the *Ashton* Plaintiffs are prepared to join in a consolidated averment and opposition brief, provided Plaintiffs are afforded a brief extension to complete their coordination work. The additional time is needed to complete the work to combine separate drafts and accommodate all Plaintiffs' points and arguments. Plaintiffs believe this additional work to consolidate the briefing and related submissions will promote the clearest presentation of the issues and arguments for the Court, and lead to a more efficient process.

Under the revised schedule Plaintiffs are proposing, the PECs and *Ashton* Plaintiffs would file their consolidated opposition to Saudi Arabia's renewed motion to dismiss on or before December 20, 2023, and Plaintiffs' joint opposition to Dallah Avco's motion to dismiss would be due on that same date. The reply briefs of Saudi Arabia and Dallah Avco would be moved by a corresponding period, making them due on January 31, 2024. The consolidated PECs' and *Ashton* Plaintiffs' sur-reply brief in opposition to Saudi Arabia's motion would then be due on or before February 21, 2024.

Plaintiffs thank the Court for its attention to this request.

Honorable Sarah Netburn  
November 22, 2023  
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Respectfully submitted,

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*On behalf of the Plaintiffs' Executive  
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*On behalf of the Ashton Plaintiffs*

cc: All MDL Counsel of Record

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*On behalf of the Plaintiffs' Executive  
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